

From: [Dan Peacock](#)
Reply To:
To: [Rose Kachadoorian](#)
Cc: [Bill Jacobs](#)
Subject: Re: Fwd: PCO: 2nd generation anti-coagulants
Date: 07/29/2008 04:19 PM
Attachments: [000056-00070.20080214.tif](#)
[000432-00748.19951030.tif](#)
[0042-00007.20050112.tif](#)

Dear Rose:

I reviewed the last accepted label, (OPP's PPLS System) and came to the following conclusions concerning the listed three (3) placepack products:

1. 56-70 (Active: Chlorophacinone)



000056-00070.20080214.tif

Pests: Norway rat, roof rat, house mouse, and chipmunks

Labeling: 4.5 oz size (3 , 1.5 oz placepacks) or larger sizes; both outer container and placepack are to have identical labeling; product may be sold in groups of 3 or more for all pests. The application directions for the 4.5 oz size states: "The amount of bait in 3 x 1.5 ounce place pack of this product is unlikely to be sufficient to kill more than 1 or 2 rats."

Labeling: 1.5 oz size (mouse only product); label has full text and may be sold individually only for House mouse.

Follow-up: I am working on an amendment for this product now. Eaton was suppose to send final printed labels, which we do not normally see. I need to make sure that they submitted all labeling and that the placepack label has a prohibition against selling individual packs when sold in groups of 3 with all species.

2. 432-748 (Active: Bromethalin)



000432-00748.19951030.tif

Pests: Norway rat, roof rat, house mouse, and chipmunks

Labeling: 3 lb (96 x 1/2 oz placepacks) place pack labels have abbreviated labeling, must not be sold individually; There is statement that individual sale is illegal

3. 4271-7 (Active: Warfarin)



0042-00007.20050112.tif

Pests: Norway rat, roof rat, house mouse, and chipmunks

50 lb size; The website did not have the placepack label so I do not know the size of the pack (probably 4 oz).

I also do not know if there were smaller sizes than 50 lb. Applicators have to open the pack first.

Follow-up: I will determine if there is place pack label. I not, I will get one.

General Thought: Perhaps we need to add text on the outer label reminding sellers not sell individual packs.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-305-6920
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch,
Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division,
Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

▼ [Rose Kachadoorian <rkachado@oda.state.or.us>](mailto:rkachado@oda.state.or.us)

Rose Kachadoorian
<rkachado@oda.state.or.us>

To Dan Peacock/DC/USEPA/US@EPA
cc

07/29/2008 12:50 PM

Subject Fwd: PCO: 2nd generation anti-coagulants

This statement below (WE DO NOT repackage the 50 lb bag product.) is in contrast to what "Jim" told me. He admitted to me that he sells his customers 5-10 lbs of material from his 50 lb bag. I explained how illegal it was. They are getting wise to my fishing for information. These people (PCO) have an enforcement his with us. I should look up how many fines they have already paid.

But I am sending you this email so you can see what products they have been providing in packets.

Rose

Begin forwarded message:

From: Dobyns Pest Control <dobynspest@hotmail.com>

Date: July 29, 2008 9:39:12 AM PDT

To: Rose Kachadoorian <rkachado@oda.state.or.us>

Subject: RE: PCO: 2nd generation anti-coagulants

AC Formula 90 1.5oz packets EPA#56-70 and Vengeance EPA#432-748. We supply a copy of the full label & MSD's with the product we sell. For the most part when we sell the small bait packs, we sell them by the full bucket. We purchase R & M Warfarin, EPA#4271-7, in 5lb & 1 lb packages for distribution & 50 lb bags for our use. WE DO NOT repackage the 50 lb bag product.

From: rkachado@oda.state.or.us

Subject: Re: PCO: 2nd generation anti-coagulants

Date: Tue, 29 Jul 2008 09:05:13 -0700

To: dobynspest@hotmail.com

That is my understanding.

By the way, I want to make sure that I provided accurate information to Jim when I indicated that he could not distribute individual packets to potential pesticide users. A few can apparently be distributed individually (I do not at this time have a list). What is the EPA Reg. No. of the packets he distributed, I want to confirm that I was correct.

Thank you.

Rose

On Jul 29, 2008, at 8:59 AM, Dobyns Pest Control wrote:

Hello Rose,

I am now looking over the document you attached with your note from yesterday. I see that the document dated May 28, 2008 was revised on June 24, 2008. The copy we have is before the revision. I am assuming that everything in the revised copy of the document is the same EXCEPT for the highlighted areas. Is this assumption correct?

Thanks,
Arlynda
